

RETURN DATE: DECEMBER 19, 2017

STATE OF CONNECTICUT,	:	SUPERIOR COURT
<i>Plaintiff,</i>	:	
	:	JUDICIAL DISTRICT OF
v.	:	HARTFORD
	:	
RASHAD L. WILLIAMS,	:	NOVEMBER 13, 2017
<i>Defendant.</i>	:	

COMPLAINT

1. The plaintiff brings this action pursuant to Connecticut General Statute § 51-298, *et seq.*, for the recovery of costs incurred by the Office of the Chief Public Defender for the provision of public defender services to the defendant.
2. The plaintiff is the State of Connecticut, which brings this action on behalf of the Public Defender Services Commission.
3. The defendant is Rashad L. Williams.
4. The defendant is incarcerated within the Cheshire Correctional Institution, as of the date of this complaint.
5. The Cheshire Correctional Institution is located at 900 Highland Avenue, Cheshire, Connecticut 06410.
6. The defendant's Connecticut Department of Correction inmate number is 215234.
7. The defendant has been represented by Division of Public Defender Services assigned counsel on numerous occasions.

8. Examples of instances where the defendant was represented by Division of Public Defender Services assigned counsel include (but are not necessary limited to) the representation by counsel in the following legal actions:
 - *Rashad Williams #215234 v. Warden, State Prison*, TSR-CV08-4002369-S.
 - *Rashad Williams #215234 v. Warden, State Prison*, TSR-CV14-4006297-S.
 - *Rashad Williams #215234 v. Warden, State Prison*, TSR-CV14-4006325-S.
 - *State of Connecticut v. Rashad L. Williams*, AC 25515.
 - *Rashad Williams v. Commissioner of Correction*, AC 33680.
9. Services were rendered to the defendant or on his behalf by a Division of Public Defender Services assigned counsel within the ten years preceding the date of the commencement of this action.
10. Just one example of a Division of Public Defender Services assigned counsel rendering services to the defendant or on his behalf includes (but is not limited to) the filing of amended complaint or petition on or about October 6, 2016 in *Williams v. Warden*, TSR-CV14-4006325-S.
11. As of the date of this complaint, the State of Connecticut has paid Division of Public Defender Services assigned counsels at least \$48,843.42 for the services they rendered to the defendant or on his behalf.
12. Pursuant to Connecticut General Statute § 51-298(b), the State of Connecticut and the Public Defender Services Commission is empowered, through the Office of the Attorney General, to bring a civil action to recover “for the

reasonable value of services rendered” to any person represented by a public defender, including Division of Public Defender Services assigned counsel.

13. The reasonable value of services rendered to the defendant or on his behalf by Division of Public Defender Services assigned counsel is at least \$48,843.42 as of the date of this complaint.
14. The defendant, Rashad L. Williams, is liable for the reasonable value of services rendered to him or on his behalf by Division of Public Defender Services assigned counsel.
15. As of November 3, 2017, Williams had a balance in the amount of or about \$63,188.55 in his Department of Correction inmate account.

DEMAND FOR RELIEF

WHEREFORE, the plaintiff claims money damages, including:

- a. Compensatory damages;
- b. attorneys' fees;
- c. Costs;
- d. Interest; and
- e. Such other and further relief as the court deems equitable, just and proper.


STATEMENT OF AMOUNT IN DEMAND

WHEREFORE, the plaintiff claims money damages. The amount in demand, exclusive of interests and costs, is in excess of fifteen thousand dollars (\$15,000.00).

I hereby certify that I have knowledge of the financial responsibilities of the plaintiff and deem it sufficient to pay the costs.

Hereof fail not, but of this writ, with you doings thereon, make due service and return according to law.

Dated at Hartford, Connecticut, this 13th day of November, 2017



Stephen R. Finucane, Assistant Attorney General
Commissioner of Superior Court

We hereby enter our appearance for the plaintiff in this action:

PLAINTIFF
State of Connecticut

GEORGE JEPSEN
ATTORNEY GENERAL

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